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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

EARNEST PLATT,

Plaintiff,

vs.

NATIONAL GENERAL INSURANCE  
COMPANY, DOES I-X, and ROE  
CORPORATIONS I-X, inclusive,

Defendants.

CASE NO.: 2:18-cv-00067 -RFB-CWH

**STIPULATION AND ORDER TO EXTEND  
DEADLINES FOR DISCOVERY AND  
DISCLOSURE OF EXPERTS**

*First Request*

IT IS HEREBY STIPULATED by and between THOMAS E. WINNER and VIRGINIA T. TOMOVA, attorneys for Defendant, NATIONAL GENERAL INSURANCE COMPANY, and TRAVIS H. DUNSMOOR, attorney for Plaintiff EARNEST PLATT, pursuant to LR 26-4.

**1. DISCOVERY COMPLETED**

Both Plaintiff and Defendant served their initial FRCP 26(f) document and witness disclosures. Defendant has served Plaintiff with written interrogatories and requests for production, and Plaintiff has answered.

**2. DISCOVERY TO BE COMPLETED**

Counsel for NATIONAL GENERAL INSURANCE COMPANY has scheduled the deposition of the Plaintiff for August 27, 2018. Further, the parties will also seek to depose the retained expert witnesses that will be disclosed by the parties.

Defendant will complete the afore-mentioned depositions; will depose Plaintiff's designated expert witnesses once identified, and will request Plaintiff undergo an examination

pursuant to FRCP 35(a). Counsel understands that the treating physicians are typically booked for depositions two to three months in advance, and so coordinating these depositions will take longer than initially anticipated.

### 3. WHY DISCOVERY WAS NOT COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER

The parties have been diligent in serving their initial disclosures, in reviewing those Disclosures, and in pursuing Written Discovery. The parties believe, however, that meaningful depositions should take place after August 27, 2018. Plaintiff Earnest Platt's deposition is scheduled to take place on August 27, 2018. The number of Depositions that need to be taken, together with the expected complexities in the scheduling of the Depositions, necessitate that the Deadline for Discovery be extended as requested herein. In addition, meaningful evaluation by the parties' experts will require the Experts' review of the Depositions of fact witnesses, necessitating that the Deadline for Disclosure of Experts and Expert Reports be correspondingly extended.

### 4. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY

The parties propose the following schedule:

ACTIVITY	CURRENT DEADLINE	PROPOSED DEADLINE
Interim Status Report	July 12, 2018	<b>October 12, 2018</b>
Initial Expert Disclosures	July 12, 2018	<b>October 12, 2018</b>
Rebuttal Expert Disclosures	August 13, 2018	<b>September 13, 2018</b>
Deadline to Complete Discovery	September 10, 2018	<b>December 10, 2018</b>
Dispositive Motions	October 10, 2018	<b>January 10, 2019</b>
Pretrial Order	November 12, 2018	<b>February 12, 2019</b>

Dated this 11th day of July, 2018.

ATKIN WINNER & SHERROD

*/s/ VIRGINIA T. TOMOVA*  
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*Attorneys for Defendant*

Dated this 11th day of July 2018.

RICHARD HARRIS LAW FIRM

*/s/ TRAVIS H. DUNSMOOR*  
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 801 South Fourth Street  
 Las Vegas, Nevada 89101  
*Attorneys for Plaintiff*

**ORDER**

**IT IS SO ORDERED.**

Dated this 12 day of July, 2018.

  
UNITED STATES MAGISTRATE JUDGE